

UNITED STATES DISTRICT COURT
for the
Eastern District of Michigan

United States of America

v.

BRANDON CARTER

Case: 2:22-mj-30399

Assigned To : Unassigned

Case No. Assign. Date : 9/16/2022

Description: RE: BRANDON
CARTER (EOB)**CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of September 11, 2022 in the county of Wayne in the
Eastern District of Michigan, the defendant(s) violated:

*Code Section**Offense Description*

18 U.S.C. § 922(u)

Theft of Firearms from a Federal Firearms Licensee

18 U.S.C. § 922(j)

Knowingly Possessing Stolen Firearms

This criminal complaint is based on these facts:

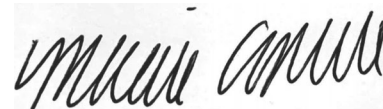
See attached affidavit

☒ Continued on the attached sheet.

Sworn to before me and signed in my presence
and/or by reliable electronic means.

Date: September 16, 2022

City and state: Detroit, MI



Complainant's signature

Mallorie Campbell, Special Agent, ATF

Printed name and title

s/David R. Grand

Judge's signature

Hon. David R. Grand, United States Magistrate Judge

Printed name and title

AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT

I, Mallorie Campbell, being first duly sworn, hereby depose and state as follows:

1. I am a Special Agent with the Bureau of Alcohol, Tobacco, Firearms and Explosives since December of 2021. I am currently assigned to the Detroit Field Division, Group IV. I have had extensive training at the Federal Law Enforcement Training Center in the Criminal Investigator Training Program and ATF Special Agent Basic Training. Before working for the ATF, I was a Sheriff's Deputy with the Jefferson County Sheriff's Office, Louisville, KY, for approximately eight years. Prior to becoming a Special Agent with ATF, I was assigned to the Federal Bureau of Investigation, Louisville, White Collar Crimes Task Force as a Task Force Officer for approximately four years.

2. The facts contained in this affidavit come from my personal observations, my training and experience, my review of documents and statements, information obtained from other law enforcement officers, and individuals with knowledge of this matter. This affidavit does not provide every detail I know regarding this investigation.

3. Based on ATF's investigation in this case, there is probable cause showing that (1) BRANDON CARTER ("B", B/M, DOB xx-xx-xx00) violated and aided and abetted the violation of Title 18 U.S.C § 922(u) (Theft of Firearms

from a Federal Firearms Licensee) and Title 18 U.S.C, § 922(j) (Knowingly Possessing Stolen Firearms), and (2) and DAMOND JORDAN JR. (“TURK”), B/M/, DOB xx/xx/xx03, violated Title 18 U.S.C, § 922(j) (Knowingly Possessing Stolen Firearms), as discussed below.

Probable Cause

4. On September 11, 2022, at approximately 4:31 am, a Kia SUV, that was reported stolen that same day, crashed through the front of the Freedom Holster Gun Shop, a Federal Firearms Licensee (FFL), located at 1310 S. Wayne Road, Westland, MI, 48186. I reviewed the video from surveillance cameras from the FFL and approximately seven unknown individuals rushed into the FFL and were observed grabbing multiple firearms seconds before exiting the FFL (see exhibits 1 and 2). The FFL estimate approximately fifty firearms were stolen. The unidentified individuals exited through the front and ran eastbound towards Hazelwood Street. It appears the unidentified individuals were wearing facemasks, gloves, long sleeved shirts, and some were in possession of a bag. The individuals were inside the FFL for less than one minute.

5. Thirty minutes later, at approximately 5:00 am, two individuals wearing dark clothing were seen breaking into a CVS Pharmacy store, located at 7291 N. Middlebelt Road, Westland, MI, 48185, and exited with bottles of liquor. This CVS is approximately 5.7 miles from Freedom Holster Gun Shop. The

robbers were in the store less than one minute. Surveillance video captured part of the theft. Officers compared the two videos, and at least one of the two individuals robbing the CVS appears to be wearing the same clothing as one of the individuals who burglarized the Freedom Holster Gun Shop. The individual appears to be wearing the same dark colored pants with white stripes on the pant leg.

6. On the same date, at approximately 5:04 am, a silver Dodge Journey, later reported stolen, crashed through the front of CC Coins Jewelry and Loan, an FFL located at 24614 W. Warren St., Dearborn Heights, MI 48127. Shortly after crashing into the store, while the driver of the vehicle departed the location three unknown individuals entered through the front of the FFL and after a short time the unknown individuals exited with multiple firearms. Two individuals were wearing blue hooded sweatshirts and face masks while the third individual was wearing a grey hoodie and dark pants. Officers compared the video from the CC break-in with the video from the Freedom Holster Gun Shop break-in, and one of the individuals appears to be wearing the same clothing in both burglaries: a gray hoodie and dark pants (although this individual is wearing different masks in the two different burglaries). The FFL estimate approximately twenty-two firearms were stolen.

7. On September 12, 2022, at approximately 12:15 am, a blueish gray Chevrolet Equinox, later reported stolen, crashed through the front of CC Coin

Jewelry and Loan. This is the same location that was burglarized on September 11, 2022. Shortly after crashing into the store, two unknown black males and a third unknown male entered through the front of the FFL, grabbed multiple firearms, exited, and returned for more firearms. Approximately fifteen minutes later the unknown individuals exited with multiple firearms. The burglary on September 12, 2022, was conducted in the same manner as the burglary on the previous day.

8. During the investigation, ATF received information that BRANDON CARTER was involved in the burglaries.

9. On September 15, 2022, Agents obtained and executed a federal search warrant at a residence in Detroit CARTER had been observed leaving. During the search of the location, Agents recovered a Walter model PPQ, 22 caliber semiautomatic pistol bearing serial number PP036269, that was stolen from CC Coins during the FFL burglaries. CARTER and his brother DAMOND JORDAN (“TURK”) were present in the residence and detained for questioning. The pistol was seized from an upstairs closet.

10. BRANDON CARTER was advised of his Miranda Rights which he stated he understood and agreed to speak with Agents. CARTER admitted to being present at both CC Coins robberies. Among other things, CARTER stated that during the evening of September 10 or early morning of September 11, he drove to

CC Coins to act as the escape vehicle for others who entered the store and stole the firearms.

11. CARTER reported that a day later he and others returned to CC Coins. CARTER stated that he waited in the car while others entered the store. CARTER became anxious of the time they were taking inside of the store and returned with another to his residence where they took the stolen firearms.

12. DAMOND JORDAN JR. was also interviewed. JORDAN was advised of his Miranda Rights which he stated he understood, signed, and agreed to speak with Agents. JORDAN stated that he knew his brother, CARTER, and others participated in the FFL thefts. JORDAN did not participate in the robberies but observed an AR rifle in the basement of his residence soon after the thefts. JORDAN also admitted to trading an individual a rifle magazine in exchange for a pistol. JORDAN admitted to knowing the firearm was stolen and stated he was going to try to sell it. JORDAN admitted to throwing the pistol into the upstairs closet when Agents arrived on September 15, 2022.

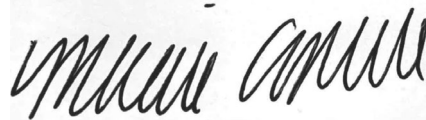
Conclusion

13. Based on the aforementioned facts, I submit that there is probable cause showing that (1) BRANDON CARTER (“B”, B/M, DOB xx-xx-xx00) violated, and aided and abetted the violation, of Title 18 U.S.C § 922(u) (Theft of Firearms from a Federal Firearms Licensee) and Title 18 U.S.C, § 922(j)

(Knowingly Possessing Stolen Firearms), and (2) and DAMOND JORDAN JR.

("TURK"), B/M/, DOB xx/xx/xx03, violated Title 18 U.S.C, § 922(j) (Knowingly Possessing Stolen Firearms).

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "Mallorie Campbell", is written over a light gray rectangular background.

Mallorie Campbell, Special Agent
Bureau of Alcohol, Tobacco, Firearms
and Explosives

Sworn to before me and signed in my
presence and/or by reliable electronic means.

s/David R. Grand

Honorable David R. Grand
United States Magistrate Judge

Date: September 16, 2022